

## SECOND DECLARATION OF GUADALUPE PEREZ

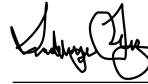
I, Guadalupe Perez, make the following declaration based on my personal knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a practicing attorney licensed to practice before the State of Illinois. My business address is 69 W. Washington, Chicago, IL 60602. I have been employed as Assistant Public Defender the Law Office of the Cook County Public Defender since February 2022. I am over the age of 18 and am competent to testify regarding the matters described below.
2. I have practiced exclusively in immigration law since 2016, representing hundreds of noncitizens in removal proceedings before the Executive Office for Immigration Review (EOIR) and federal courts and/or with applications and petitions for immigration benefits or relief filed with U.S. Citizenship and Immigration Services (USCIS).]
3. I began representing O.G.M. on November 1, 2024. On February 10, 2025, he won protection under the Convention Against Torture (CAT) from El Salvador from an immigration judge on the basis of being kidnapped and tortured by Salvadoran gangs and police. The information in this declaration is based on my conversations with O.G.M.
4. Approximately, on September 18, 2025, the U.S. Department of Homeland Security (DHS) notified O.G.M that they intended to deport him to Mexico. O.G.M. stated he was afraid of deportation to Mexico. On October 30, 2025, O.G.M had a fear interview as to Mexico. Despite testifying about having been kidnapped, beaten and extorted by Mexican police officers on multiple occasions, DHS determined that O.G.M had not established that it is more likely than not that he would be persecuted or tortured in Mexico.
5. On November 5, 2025, DHS attempted to remove O.G.M. to El Salvador, the country to which an immigration judge determined DHS was forbidden from removing him. Fearing future attempts of deportation to El Salvador, O.G.M. accepted his removal to Mexico.
6. On November 17, 2025, O.G.M. was removed from El Valle Detention Center to Mexico. Immigration officers took him and others out of the detention center by bus. The bus stopped at the Hidalgo crossing, but prior to this stopped at another detention center to pick up other individuals.
7. O.G.M. related that when they arrived at the border, O.G.M. informed the officers that he was afraid to return to Mexico and that he was not going to get off the bus. O.G.M. related that, including him, four remained. U.S. immigration officers arrived, and one officer punched O.G.M. in the stomach and pulled him out of the bus. O.G.M. feared them as they beat the other individuals, including dragging one man out of the bus by his feet, causing him to hit his head as they took him down the bus stairs. The officers then kicked this man on the floor, and he ultimately needed a wheelchair to complete the crossing.

8. O.G.M. told me that when they crossed the border, he felt terror and panic. The U.S. immigration officers told the Mexican immigration officers in Spanish that they needed to fix him. As they were crossing the border, O.G.M. stated he saw a young man sitting on a bench, tattooed with a cell phone. Later, Mexican immigration officials told them that if they did not cooperate, he would turn them over to that young man who belonged to cartel.
9. O.G.M. related that inside the Mexican immigration institute, he asked if he could receive asylum. The immigration official told him he had 10 days to leave the country. He was also informed that Mexico did not have an asylum treaty with the United States. He was told that he was there illegally and had to leave the country. They didn't offer him any options.
10. Next, O.G.M. was taken to an immigration station in Reynosa where he and others were able to call family members. He and others were then forced to board a bus to Villahermosa. They were not allowed to have shoelaces, belts or phones. They were escorted by the National Guard on the bus. Although they made a stop at Mexico City, they were not allowed to leave the immigration station. The bus ride lasted approximately twenty-hours.
11. Upon O.G.M.'s arrival in Villahermosa, he was sent to an immigration station where he was detained for 36 hours. He asked for asylum. However, he was told that was not an option. He was forced to sign documents essentially stating that he entered Mexico irregularly and was there illegally.
12. O.G.M. is in Mexico, without any valid identity documents. He is isolated in Villahermosa without a way of exiting as he does not have his passport. He states that there are three immigration checkpoints that threaten him with arrest and detention if he tries to leave without proper documentation. He has no resources. He is currently hiding in a hotel in Villahermosa with other similarly situated individuals.
13. O.G.M. has related that he is afraid for his life. He and his friends' families have received extortion calls. They all called family members at the Mexican immigration stations in Reynosa. Further, O.G.M. managed to get a cell phone but soon after started receiving threatening phone calls. He stated the other men he was staying with also received the phone calls. They told them they were going to be picked up and he presumes that it is the cartel that will do this. O.G.M. is afraid of remaining in Villahermosa and fears he has few options. He has heard of other Salvadoran men who were deported to Mexico and kidnapped.

I declare under penalty of perjury that the above information is true and correct to the best of my knowledge.

Executed this 28<sup>th</sup> day of November 2025 at Chicago, Illinois.

A handwritten signature in black ink, appearing to read 'Guadalupe Perez', written above a horizontal line.

Guadalupe Perez